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11 Attorneys for Plaintiff
12 RAHINA IBRAHIM

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 RAHINAH IBRAHIM, an individual,

Case No. C 06-0545 WHA

16 Plaintiff,

17 vs.
18 DEPARTMENT OF HOMELAND SECURITY, et
19 al.,
20 Defendants.

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE DATE OF HEARING ON
THE MOTIONS TO DISMISS FILED BY
THE CITY AND COUNTY OF SAN
FRANCISCO AND US INVESTIGATIONS
SERVICES, INC.**

21 THE PARTIES TO THIS ACTION HEREBY STIPULATE AS FOLLOWS:

22 On August 28, 2006, defendants, City and County of San Francisco, James F. Cunningham,
23 Elizabeth A. Maron and Richard E. Pate, filed Defendants' Motion To Dismiss Plaintiff's First Amended
Complaint. On August 31, 2006, plaintiff and defendants, City and County of San Francisco, James F.
Cunningham, Elizabeth A. Maron and Richard E. Pate filed a stipulation setting the hearing on
October 19, 2006, at 8:00 a.m.

24 On September 13, 2006, defendant, US Investigations Services, Inc., also filed its motion to
25 dismiss plaintiff's First Amended Complaint and set the hearing on October 19, 2006, at 8:00 a.m.
26 Collectively, the above motions to dismiss are referenced herein as "Defendants' Motions."

27 On September 15, 2006, plaintiff filed a Notice of Appeal of this Court's order on the motions to
28 dismiss and partial judgment, entered on August 16, 2006.

1 On September 20, 2006, the federal defendants filed a motion to amend or alter the Court's partial
2 judgment, entered on August 16, 2006. The federal defendants' motion is set for hearing on November
3 2, 2006.

4 Plaintiff will be filing an administrative request to stay this action pending determination of
5 plaintiff's appeal, pursuant to Civil Local Rule 7-11. Plaintiff would like to have an opportunity to have
6 her request adjudicated before filing an opposition to the defendants' motions.

7 The parties, therefore, have agreed to continue hearing on Defendants' Motions to **November 2,**
8 **2006, at 8:00 a.m.**, the same time that the federal defendants' motion is set for hearing.

9 IT IS SO STIPULATED.

10 Dated: September 25, 2006

DENNIS J. HERRERA, City Attorney
JOANNE HOEPER, Chief Trial Deputy
RONALD P. FLYNN, Deputy City Attorney

13 By: _____ /S/
14 RONALD P. FLYNN, ESQ.

15 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
16 JAMES F. CUNNINGHAM, ELIZABETH A.
MARON, AND RICHARD E. PATE

18 Dated: September 25, 2006

19 McMANIS FAULKNER & MORGAN

20 By: _____ /S/
21 MARWA ELZANKALY, ESQ.

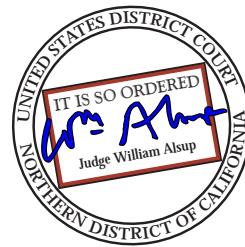
22 Attorneys for Plaintiff
RAHINAH IBRAHIM

24 Dated: September 25, 2006

25 ARNOLD & PORTER LLP

26 By: _____ /S/
27 SHARON DOUGLASS MAYO, Esq.

28 Attorneys for Defendant
U.S. INVESTIGATIONS SERVICES, INC.



1 IT IS SO ORDERED
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3 DATED: September 26, 2006
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JUDGE OF THE U.S. DISTRICT COURT